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INDIANAPOLIS

OFFICE MEMORANDUM

DATE:

April 11, 1991

TO:

Pollution Control Industries of Indiana RCRA FilmU:

Bruce Kizer

IND 000646943, East Chicago, Lake County

FROM:

Ted Warner TW

Compliance Monitoring Section

SUBJECT: Trip Report for the Scheduled Inspection of

February 26, 1991

EPA Region 5 Records Ctr.



On February 26, 1991, I began an unannounced compliance evaluation inspection at Pollution Control Industries of Indiana (PCII) located at 4343 Kennedy Avenue, East Chicago, Indiana. The facility was represented by Ms. Tita LaGrimas and Ms. Dawn Pichnan of Manifest Tracking.

Preinspection File Audit

My preinspection file audit revealed that PCII has not yet responded to violation letter (VL-10647) dated February 4, 1991. This VL was a result of my last scheduled inspection conducted on August 23, 1990. I had spoken to Ms. LaGrimas following the August 23, 1990, inspection and she had informed me that the three (3) items of concern, all related to the storage or "staging" outside of interim status areas, had been addressed.

PCII's hazardous waste storage and treatment Part B Permit Application has been reviewed for technical adequacy. On November 1, 1990, a permit application Notice of Deficiency was mailed to Pollution Control Industries of Indiana from our Plan Review and Permit Section. An extension to the required response time was for granted, therefore PCII has not yet responded.

The files also indicate there has been a change in PCII's Part A notification information. The facility has added all of the new TC Hazardous Waste and a few new "U" hazardous wastes. My preinspection file audit check list contains all PCII's current notification information.

Inspection Findings

I began my tour portion of this inspection with an emphasis on PCII's compliance with management of bulk container "heels". Three (3) trailers were on site that were identified as "empty". We inspected all three from the top person way. I observed less than two (2) inches of contents. All three (3) tankers had less than forty (40) gallons of waste according to Ms. LaGrimas. Ms. LaGrimas also explained PCII's policies concerning "heels". Heels that remain following unloading of an incoming manifested load are manually removed (spoon out). Heels that are present in trailers that come on site and represented as empty will not be "overloaded". The trailers are rejected. These policies are unwritten. I asked Ms. LaGrimas to include these policies in the required written personnel training program. She agreed to make the additions to the training program.

Following the examination of the container heels management, I completed my tour of the entire facility. I inspected tank farm areas two (2) and three (3) container storage areas one (1) and two (2) and subpart x units in area one (1). The subpart x units are the wet and dry shredders. I noted no apparent violations. I did observe that the waste storage inventory was very low. I inquired about my observation and was informed that several of the disposal and treatment facilities were down for repairs.

I also looked for the "staged" wastes and storage of waste outside of interim status units. Both of these activities were noted during my previous inspection. I found no evidence of this activity.

Following the visual inspection portion of my visit I reviewed all required documents and records, I reviewed random examples of incoming and outgoing hazardous waste manifests. I found no new apparent violations. My inspection report forms contain the specific compliance status information for each regulated unit or area and required documents.

Conclusions and Recommendations

As a result of this inspection, I will prepare a Letter of Compliance for staff consideration. I will also forward a copy of this trip report to our Enforcement Section in order to assist in the resolution of VL-10647.

TFW/sh

cc: Ms. Pam O'Rourke, Enforcement Section

3-18-91